Annual Ethics Training 2005

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The Rules on Job Hunting and Post-Government Employment

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Speaker Notes for Header Slide

- ✓ **This discussion will provide you with an overview of the rules for seeking employment opportunities outside the government and what restrictions may apply to you once you leave government service**

Overview

- ✓ **Job Hunting Rules**
- ✓ **Post-Government employment rules**

Speaker Notes Overview

- This year the Army is requiring a discussion of job hunting rules and post Government employment rules because of a high level government employee who was awarding contracts to Boeing while at the same time negotiating for employment with the company.

- Under 18 USC 208, a criminal law, an employee shall not participate personally and substantially in a particular government matter that, to his knowledge, has a direct and predictable effect on the financial interests of a prospective employer with whom he is seeking employment. "Particular government matter" would include a government contract, task order, delivery order, source selection, sale of government asset, claim against the government, etc.

Job Hunting - The Key Rule

- ✓ **Must disqualify yourself before you "seek" employment**
- ✓ **Written disqualification required**

Speaker Notes
Job Hunting - The Key Rule

- ✓ **The key rule to remember is that you are required to disqualify yourself from taking any official actions relating to a company before you even start to seek employment with that company**

- ✓ **This disqualification must be in writing.**

Disqualification Statement

SUBJECT: Disqualification Statement
DATE:
MEMORANDUM FOR: (Supervisor)

1. This is to notify you that I am commencing employment negotiations with Company X....
2. Accordingly, I may not personally and substantially participate ....
3. Matters involving Company X should be handled without my knowledge ...

_____
Name
Title
Agency and address
Commercial phone number

I, (Name of supervisor) have reviewed the subject disqualification statement ...

_____
Supervisor

CF:
Ethics Counselor, AMSFS-GC/Marina Yokas-Reese

Speaker Notes
Disqualification Statement

- Here is a sample of a written disqualification statement that you would execute prior to seeking employment with a company. You can obtain a copy of this form from your ethics counselor.

- Once you complete the form by identifying which company you will be seeking employment with and certify that you will take no official action involving this company you provide a copy to your supervisor and your ethics counselor for approval.

"Seeking Employment"

- You are "seeking employment" when you:
  - make unsolicited employment contact
    - includes sending resume
  - engage in negotiations
  - respond to unsolicited proposal (except unconditional rejection)

Speaker Notes
"Seeking Employment"

- So the next issue to address is at what point are you required to disqualify yourself by executing the written disqualification statement—
- The rules provide that you must disqualify yourself before you even send out a resume to a company-this is important to remember because to most that seems overly conservative-after all they may not even be interested in discussing employment with you---but that is the rule under the Joint Ethics Regulation.
- In the case where a company contacts you and indicates they are interested in discussing employment opportunities with you – you are required to execute a disqualification statement unless you immediately and unequivocally reject their offer.
- Merely deferring an offer to discuss employment opportunities --for example saying something like "Why don't we talk after I retire in a couple of months" would still require you to disqualify yourself because it does not constitute an unequivocal rejection of their offer.

End of “Seeking Employment”

- **Until either party rejects employment and discussions end**
- **Until two months after sending resume and no answer**

Speaker Notes
End of "Seeking Employment"

- If you haven't heard back in 2 months after sending a resume or
- --employment discussions are ended by either party then you are no longer considered to be seeking employment and the disqualification statement can be rescinded.

Job Hunting - Expenses

- ✓ **A Federal employee may accept meals, lodgings, transportation and other benefits**
- ✓ **Customarily provided by a prospective employer**
- ✓ **In connection with bona fide employment discussions.**

Speaker Notes
Job Hunting - Expenses

- **While Seeking employment, you can accept**
  - **--meals**
  - **--lodging**
  - **--transportation**
- **From the prospective employer that they customarily offer to all prospective employees for similar positions.**

Job Hunting – After You've Found the Job

- ✓ **Remain disqualified until you leave**

Speaker Notes

Job Hunting – After You've Found the Job

- ✓ **Once you find a job—you must remain disqualified from participating in any matter affecting your new employer until you retire or leave government service.**

Representing Others
18 USC 205

- ✓ **Federal employees may not represent individuals, companies or other organizations before any Federal agency.**
- ✓ **Rule applies whether representation is compensated or uncompensated**
- ✓ **Rule applies until retirement date, including while on ordinary and terminal leave**

Speaker Notes
Representing Others
18 USC 205

- ✓ **While you are an employee of the federal government you cannot represent another before the federal government**

- ✓ **For example, if you accept a job with a defense contractor you can't represent them to the federal government until you are officially off the roles**

- ✓ **This is a rule retired military need to be aware of as it relates to terminal leave where you may still be on the official roles for a long period of time until you are officially retired. Remember during your period of terminal leave you cannot represent your new employer before the federal government.**

Ongoing Obligation

- ✓ **Employees may not disclose non-public information to further their own private interests, or the private interests of another.**
- ✓ **Definition of “Non-public information”**
- ✓ **Obligation continued even after you leave**

Speaker Notes
Ongoing Obligation

- As government employees we all have an obligation to protect and not disclose nonpublic information-This obligation continues even after you leave government service. Non Public information is any information that you know or reasonably know has not been released to the public—if you aren't sure its your obligation to ask the status of the information before you decide to discuss it with someone-
- Examples of nonpublic information would include-future acquisition requirements, government cost and pricing data, proprietary data of all types provided to the government by contractors, and of course any information that has been classified.

Additional Reporting Requirement Procurements – The Rule

- In a $100,000+ competitive procurement –
  - Report all employment contacts with bidders or offerors to your supervisor and agency ethics official
  - Either reject offer or disqualify yourself

Speaker Notes
Additional Reporting Requirement
Procurements – The Rule

- **There is an additional reporting requirement if you're involved in an acquisition above the simplified acquisition threshold ($100,000) and are contacted by a potential offeror.**

- **In these cases you are required to report contacts made by offerors to your supervisor, the Procuring Contracting Officer (PCO) and your ethics counselor.**

Post – Government Employment Restrictions

Speaker Notes
Post – Government Employment Restrictions

- **Once you leave government service—there are laws that may impact your activities with your new employer.**

Procurement Integrity Law – One-Year Compensation Ban

- ✓ If you served in one of seven positions; or
- ✓ If you made one of seven decisions
- ✓ On a contract over $10M
- ✓ One year
- ✓ No $

Speaker Notes
Procurement Integrity Law – One-Year Compensation Ban

- The first restriction we will discuss is the Procurement Integrity Act

- The Act provides that if you served in one of seven identified positions—or made one of seven identified decision on a contract valued over $10 million you may not accept compensation from the contractor for one year after either serving in that position or making the decision.

- Compensation is defined as wages, salaries, honoraria, commissions, professional fees and any other form of compensation provided directly or indirectly for services rendered. Compensation is indirectly provided if it is paid to an entity other than the individual, specifically in exchange for services provided by the individual.

One-Year Compensation Ban – Seven Positions

- ✓ Procuring Contracting Officer
- ✓ Source Selection Authority
- ✓ Member of Source Selection Evaluation Board
- ✓ Program Manager
- ✓ Deputy Program Manager
- ✓ Administrative Contracting Officer
- ✓ Chief of financial or technical evaluation team

Speaker Notes
One-Year Compensation Ban –

Seven Positions

- **These are the seven positions that trigger the one year compensation ban –if you served as a PCO, a Source Selection Authority or were a member of a Source selection evaluation board, a program or deputy program manager, or the Chief of a financial or technical evaluation team on a contract valued over $10 million dollars you may not accept compensation for a one year period after serving in one of these positions. So, for example, if you were a Procuring Contracting Officer on a contract valued over $10 million dollars up until the day you retired you can't accept compensation with that particular contractor for one year after leaving government service-**

One-Year Compensation Ban – Seven Decisions

- ✓ **Decision to award a contract over $10 million**
- ✓ **Decision to award a subcontract over $10 million**
- ✓ **Decision to award a modification that is over $10 million of a contract or subcontract**
- ✓ **Decision to award a task order or delivery order over $10 million**

Speaker Notes
One-Year Compensation Ban – Seven Decisions

- Here are the seven decisions that trigger the compensation ban—

- Continued on the next chart.

One-Year Compensation Ban – Seven Decisions – Cont'd

- ✓ **Decision to establish overhead or other rates applicable to a contract or contracts valued over $10 million**
- ✓ **Decision to approve issuance of a contract payment or payments over $10 million**
- ✓ **Decision to pay or settle a claim over $10 million**

Representational Restrictions 18 USC 207

- ✓ **Lifetime representation ban – 18 USC 207(a)(1)**
- ✓ **Two-year representation ban - 18 USC 207(a)(2)**
- ✓ **One-year ban trade or treaty negotiations - 18 USC 207(b)**
- ✓ **One-year no contact rule - 18 USC 207(c)**
- ✓ **One-year ban on assisting foreign entities - 18 USC 207(f)**

Speaker Notes
Representational Restrictions
18 USC 207

- The law, 18 United States Code Section 207 contains representational restrictions. The law prohibits "communications" and appearances" that are made "with the intent to influence."
- A "communication" can be made orally, in writing, or through electronic transmission. An "appearance" extends to a former employee's mere physical presence at a proceeding when the circumstances make it clear that his attendance is intended to influence the United States. An "intent to influence" the United States may be found if the communication or appearance is made for the purpose of seeking a discretionary Government ruling, benefit, approval, or other action, or is made for the purpose of influencing Government action in connection with a matter which the former employee knows involves an appreciable element of dispute concerning the particular Government action to be taken. Accordingly, the prohibition does not apply to an appearance or communication involving purely social contacts or a request for publicly available documents,
- The provision does not prohibit "behinds the scenes" assistance for your new employer.

Lifetime Representation Ban
18 USC 207 (a)(1)
Applies to All Officers & Employees

- ✓ **Forever prohibited from representing another**
  - ➢ **On a particular matter**
  - ➢ **Personally and substantially involved with as a Government employee**

Speaker Notes
Lifetime Representation Ban
18 USC 207 (a)(1)
Applies to All Officers & Employees

- **Under 18 USC 207 (a)(1) you are forever prohibited from representing another in a particular matter if you were personally and substantially involved with as a government employee in a particular matter.**

- **As an example, lets go back to the PCO, under 18 USC 207 he could never represent another back to the government on a contract he served on as the PCO. However, he could work behind the scenes on the matter on behalf of his new employer.**

Two- Year Representation Ban
18 USC 207 (a)(2)
Applies to All Officers & Employees

- ✓ **For 2 years**
  - ➢ **Cannot represent**
  - ➢ **On a particular matter**
  - ➢ **Pending under your official responsibility during your last year of Government service**

Speaker Notes
Two- Year Representation Ban
18 USC 207 (a)(2)
Applies to All Officers & Employees

- ✓ **Under 18 USC 207, an employee is also prohibited for two years after leaving government service from representing another on any particular matters that were pending under his or her official responsibility during their last year of their government service—this restriction would be applicable for example to a supervisor, a head of a directorate, or an organization. This representation restriction applies as long as the matter was pending under their official responsibility even if they were not personally and substantially involved in the matter--**

- ✓ **Remember again-- that the representational bans contained in 18 USC 207. Both the lifetime ban and the 2 year ban are representational bans –and do not prohibit you from providing 'behind-the-scenes' assistance in connection with the matter – So if you went to work for a contractor you could assist them behind the scenes on issues involving a particular matter you were involved with as a government employee-for example on a particular contract or claim-but you cannot personally contact or discuss the matter-either orally or in writing -- with government employees.**

Trade/Treaty Negotiations
18 USC 207 (b)
Applies to All Officers & Employees

- For 1 year you may not represent or advise:
  - Anyone else
  - On a treaty or trade negotiation
- On which you worked during your last year in Government service

Speaker Notes
Trade/Treaty Negotiations
18 USC 207 (b)
Applies to All Officers & Employees

- For one year you may not represent or advise
  - --anyone else
  - --on a treaty or trade negotiation
  - --you worked on during your last year of government service

Additional Restrictions on Senior Officials 18 USC 207(c) 18 USC 207(f)

- ✓ Who is a “senior official”?
- ✓ Flag and General Officers
- ✓ Civilian employees
  - ➢ Whose basic pay exceeds $140,216.50+ (2005)
- ✓ For 1- Year
  - ➢ No representing back to the agency
  - ➢ No aid, advice, or representation of a foreign government or foreign political party

Speaker Notes
Additional Restrictions on Senior Officials
18 USC 207(c)
18 USC 207(f)

- ✓ **Under 18 USC 207 there are additional restrictions that only apply to members of the Senior Executive Service (SES members) and to General Officers.**

- ✓ **There is a one year cooling off period for SES and General Officers after they retire from federal service. Under the law for a one year period they are prohibited from contacting the Department from which they retired —So the Army General who retires cannot contact the Department of the Army for a one year period-- Once again they also can work in the background and ghost-write and prepare for those who are going to brief Army personnel just as long as they do not sign the document, and just as long as they do not do the briefing or even attend the briefing. Somebody else must interface with the Army until one year has passed since they left Government service.**

- ✓ **Also, for a one year period they are not permitted to advising or represent a foreign government or political party.**

Restrictions on Retired Military Personnel

- Employment with and/or compensation from foreign governments and corps they control or own.
  - Must get approval from Service Secretary

- No civil office while on terminal leave
- 6-month waiting period before working for DoD
  - This restriction is suspended indefinitely

Speaker Notes
Restrictions on
Retired Military Personnel

- ✓ **Finally, in addition there are restrictions that apply to all retired personnel--**
- ✓ **-- You must get approval from Secretary of the Army to work for a foreign Government**
- ✓ **--Cannot hold a civil office with state or local government while you are on terminal leave**
- ✓ **--The 6 month waiting period before working for DOD for retired military has been suspended indefinitely since 9/11.**

Conclusion

- ✓ **Play it safe – ask your ethics counselor BEFORE taking any action**
- ✓ **Marina Yokas-Reese**
- ✓ **DSN 793-8458**

Speaker Notes
Conclusion

- **In summary, before you send out a resume or if you are approached about outside employment remember to contact your ethics counselor for guidance—**

- **Also I can provide you with an Ethics Opinion that apply the post employment restrictions to your particular situation. Remember a violation of ethics rules—disciplinary action and also criminal penalties.**

Ethics Survivor

Speaker Notes
Ethics Survivor

- Now—we will play “Ethics Survivor”

- In this game you will be represented with an ethics issue and have to choose the correct or “ethical” answer to the question.

Question 1

You can accept lunch from a contractor if the price of your lunch is worth less than $25.00

A. True

B. False

ANSWER

FALSE

General rule is we don't accept gifts from "prohibited sources" or given because of our official position*

***Exception - $20/$50**

Speaker Notes
Question 1 - Answer

- ✓ **“Prohibited sources” are those entities that do business with the agency-or seek to do business it would include defense contractors that do business with our agency.**

- ✓ **There is an exception under the rules that permit an employee may accept unsolicited gifts from a "prohibited source" or given because of your official position having an aggregate market value of $20.00 or less per occasion, provided that the aggregate market value of individual gifts received from any one person shall not exceed $50 in a calendar year.**

Question 2

A contractor takes you to lunch. He offers to pick up your bill, which comes to $22.00. You should resolve the matter by:

A. Paying the $2.00 which exceeds the $20.00 gift limit.

B. Paying the full $22.00.

C. Paying for both lunches.

Answer

B

In the case where a gift exceeds $20, you may accept the gift only if you pay the market price*

***Can't buy down**

Question 3

A British Defense official wants to get together for dinner. This is no "dive." Your bill comes to $119. The British official simply insists upon paying the bill. Your best course of action is to:

A. Decline the gift; it is worth more than $20.00.

B. Pay $99.00 – $119.00, less the gift exception.

C. Accept the dinner in the spirit of international friendship.

Speaker Notes
Question 3

- Contact me to discuss how to properly document and handle foreign gifts
- Remember this does not permit you to accept a gift of this value from a foreign contractor—they are subject to the $20 gift limit.

Answer

C

You generally may accept a gift from a foreign government worth up to $305.

Contact your ethics counselor

Question 4

You've been assigned the task of reviewing a solicitation submitted by Company X. You realize that you own $25,000 in Company X stock. You inform your supervisor that you:

A. Can't be involved in any way on the solicitation

B. Can handle it up to the point of decision

C. Can look it over for technical correctness, but not recommend or decide.

Answer

A

General rule - if you have ANY level of financial interest in a company or entity, you should not participate personally and substantially on matters that could directly and predictably affect that company.

No involvement is the cleanest way to avoid problems.

Question 5

Which of your spouse's interests or activities, below, is most likely to pose a criminal conflict of interest for you?

A. **Your spouse's job as a clerk typist**
B. **Your spouse's stock holdings**
C. **Your spouse's employment at a local college**
D. **Your spouse's gambling debts**

Answer

B

The financial interests of your:

- $ **spouse**
- $ **minor child**
- $ **general partner**
- $ **organization you serve as an officer/director/employee**
- $ **anyone you are negotiating for employment**

Imputed to you

Speaker Notes
Question 5 - Answer

- ✓ **Under 18 USC 208 the financial interests of your spouse and minor children are imputed to you---accordingly, if you are required to complete an OGE 450-financial disclosure form —remember that you are required to report the financial interests held by your spouse and minor/dependent children**

- ✓ **The OGE 450-helps us to identify all of your financial interests so that we can avoid any conflict of interests-because as we know the law says that we can't take any official actions in a matter that we have a financial interest in--**

Question 6

Ted just retired from his position as a Contracting Officer. He now works for Contractor X who has asked him to contact the Government to discuss technical data problems in a contract that he had served as the Contracting Officer for prior to his retirement. Can he?

A. Yes. He can do whatever he wants if there's not profit in it.

B. Nope. Nope. A thousand times, nope.

Answer

B

Under 18 U.S.C. 207(a)(1), a former employee generally may not represent others back to any Federal agency or official if he/she participated officially in the matter at issue at any time.

Question 7

It is permissible for the Commander of the AFSC to appear, in his official capacity, in a television ad endorsing John Deere tractors.

A. True

B. False

Answer

False

Employees generally may not use their official position, title, or authority to endorse products, services, or enterprises.

Speaker Notes
Question 7 - Answer

- **Important principle to remember. General rule is that we don't respond to surveys concerning requesting information about an nonfederal entity because we don't want our comments being used as an endorsement**

Question 8

Fred, an employee of the AFSC who is an engineer, works part-time for a private business that wants to apply for a grant from NASA to develop GPS tracking devices for alien life once its discovered. He would like to meet with NASA officials to discuss his plans.

A. He can meet with them so long as he is not paid for his efforts.

B. Because he doesn't work for NASA, he can meet with them, so long he keeps the fact that he is a current government employee out of the discussion.

C. He cannot contact them, orally or in written discussion.

Answer

C

Under 18 U.S.C. 205, a federal employee cannot represent another (in this case Fred's outside employer) before any Federal official or agency on a matter in which the U.S. is a party or has a significant interest.

Speaker Notes
Question 8 - Answer

- **There are exceptions which permit self representation or the interests of a parent, spouse or a minor child. An example would be talking to the Social Security Administration about your benefits.**

Question 9

Choose the best statement for the following: A Federal employee is prohibited from engaging in partisan political fundraising:

A. Only when in his or her official capacity.

B. Only when on Federal property or in a Federal vehicle.

C. Only on election days.

D. Under virtually all circumstances.

Answer

D

As a general rule, under the Hatch Act, Federal employees are prohibited from engaging in partisan political fundraising, both on and off the job

Speaker Notes
Question 9 - Answer

- **General Rule—may not solicit or receive political contributions—Also as federal employees we cannot run for political office. I encourage you to visit the Office of Special Counsel website---www.osc.gov. to learn about the Hatch Act.**

Question 10

A close friend from your college days asks you to write a job recommendation. He also adds that it would look REALLY impressive if you wrote it on your on your official letterhead with your official title. You say:

A. No. It would be misusing your official position.

B. Yes. You can always vouch for a friend.

C. It depends on what type of employment.

Answer

C

A government employee may sign a letter of recommendation using his official government title/letterhead when-

- **it's based on personal knowledge of the ability of an individual with whom he has dealt with in the course of federal employment; or**
- **he is recommending the individual for Federal employment**

Speaker Notes
Question 10 - Answer

- **Your recommendation must be based on personal knowledge of the individual's ability because you dealt with him in the course of your federal employment and if a contractor employee asks you for a letter of recommendation---you are required to coordinate any letter of recommendation with the Contracting Officer and an ethics counselor before writing a letter of recommendation.**

- **Also, you are permitted to use letterhead and reference your job if you are recommending someone for a federal position.**

Question 11

Bill, an analyst, is on a source selection board reviewing offers for a new agency computer system. Bill's old college roommate and good friend, is part owner of one of the companies who has submitted an offer. Can Bill serve on the technical evaluation team?

A. Yes. No problem here.

B. No. Bill has a financial conflict of interest.

C. No. Based on their close friendship there would be an appearance of a conflict interest and Bill should reveal the relationship to the Contracting Officer.

Answer

C

In accordance with the Joint Ethics Regulation you should not participate in a matter if a reasonable person knowing all the facts would question your impartiality.

Speaker Notes
Question 11 - Answer

- ✓ **Bill should not participate in evaluating the offers since he would be in a position of evaluating an offer submitted by his good friend's company- this situation creates an appearance of a conflict of interest–**
- ✓ **An appearance of a conflict of interest is where we don't actually have a financial interest either directly or through one of the relationships where the interest is imputed to us by law -(those being the financial interests of your spouse or dependent child); but it still looks bad for us to participate in the official matter because of some other relationship. This provision is to ensure that the performance of one's official duties does not give rise to an appearance of use of public office for private gain or of giving preferential treatment**
- ✓ **There is an inappropriate "appearance" where a reasonable person with knowledge of the relevant facts would question an employee's impartiality if the employee participates in a particular official Army matter.**
- ✓ **In cases where there is an appearance of a conflict of interest you are disqualified from participating in that official matter unless your supervisor authorizes you to participate in spite of the appearances. Any such authorization must be in writing and coordinated with the Ethics Counselor.**
- ✓ **Remember to always contact your ethics counselor and supervisor to determine whether you should continue to participate in a matter when the matter involves someone that you have an outside relationship with.**

Question 12

Joyce, an employee at the Command, works as a real estate broker in the evenings and on weekends. Can she make or take calls at her Government office to or from potential real estate clients?

A. Yes. As long as the calls are made during her lunch and or break time.

B. No. Never

Answer

B

The Standards of Conduct do not permit us to use Government time, information, or resources for private gain.

Question 13

Can Dan, a well intentioned government employee and father of three, place the order form for his children's school fundraiser on his desk…after all who doesn’t like cookie dough by the barrel?

A. Yes. As long as he doesn't actually actively solicit.

B. No. So sorry.

Answer

B

The general rule is that we may not solicit our fellow employees here in the workplace for donations to support local schools, scouting activities, other youth programs, church activities, and other good causes. Primary exception for workplace fundraising is the CFC.

Speaker Notes
Question 13 - Answer

- **General rule is that fundraising for all these good causes is not permitted in the workplace. Two of the big exceptions where workplace fundraising is permitted is the Combined Federal Campaign and Army Emergency Relief.**

Question 14

Brad, a hard-working attorney in the legal office, receives an e-mail that notifies him that to win the lotto all he has to do is buy a ticket and send this message to ten others. Can he forward the message using his Government computer.

A. Yes. He needs the money

B. No. He needs to keep his job.

Answer

B

Use of government communications systems (phones, fax, email, internet) shall be for official use and authorized purposes only.

Authorized purposes include personal communications that are most reasonably made while at the work place (examples include making a doctor's appt./checking in on the kids)

NEVER appropriate to use for chain letters, pornography, unofficial advertising, soliciting or selling, and gambling.

Speaker Notes
Question 14 - Answer

- ✓ **Limited personal use is permitted-**
  - ➢ **--Should be limited in duration and frequency**
  - ➢ **--To the greatest extent possible during non-duty time (lunch / breaks)**
  - ➢ **--No long distance phone calls are permitted under this exception.**
- ✓ **Remember it is never appropriate to access adult oriented sites, unofficial advertising, soliciting or selling and gambling sites—gambling is not permitted on a federal installation.**

Question 15

John, an eager-to-please price analyst, would like to give his supervisor a birthday gift. How much can he spend?

A. $10.00
B. $20.00
C. $0.00. Not permitted
D. As much as he can afford as long as its appropriate to the occasion

Answer

A

The general rule is that we may not give a gift to an official superior nor can an employee accept a gift from another employee who receives less pay.

EXCEPTION permits us an occasional basis, including occasions when gifts are traditionally given or exchanged, to give a gift other than cash valued at no more than $10.00

Speaker Notes
Question 15 - Answer

- An exception to the general rule is that we can on an occasional basis like a birthday, bosses day, and holidays---(Can't solicit or pool your $ with your co-workers for these occasional types of events)

- Also okay to share food in the office and to extend personal hospitality at your home.

Scoring

- ✓ **0 Correct – The tribe has spoken … you've been voted off the Island**
- ✓ **1-5 – Start making a raft; you may soon be headed off the Island**
- ✓ **6-10 – You've won immunity. Keep building an alliance with your ethics counselor**
- ✓ **11-14 – The tribe sees you as an asset. You will stay on the Island for awhile longer.**
- ✓ **15 – You are an ethics survivor!**

Ethics Point of Contact

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Speaker Notes
Ethics Point of Contact

- ✓ **This concludes your annual ethics training**

- ✓ **I encourage you to contact me or your servicing ethics counselor whenever you have any questions about the application of the ethics rules.**